



Educational Consortium for
Telecommunications Savings

Received & Inspected

FEB 18 2015

FCC Mail Room

LETTER OF APPEAL

February 5, 2015

Letter of Appeal
CC Docket No. 02-6
FCC, Office of the Secretary
445 12th Street SW
Washington, DC 20554

Subject: CC Docket No. 02-6 Appeal Denial for FRN# 2623014, Funding Year 2014 Dated October 1, 2014

Applicant Name: Chapel Hill-Carrboro City District
Form 471 Numbers: 965006
FRN Numbers: 2623014
SPIN: NWN Corporation-Raleigh
Billed Entity Number: 126853

Contact Information: Susan J. Gibney
790 Newtown-Yardley Road
Suite 410
Newtown, PA 18940
Voice Number: 267-352-0183
Fax Number: 215-504-5047
E-mail: sgibney@eratespecialist.org

DOCKET FILE COPY ORIGINAL

Dear Reader:

This letter is to timely appeal the SLD's decision to deny funding and the subsequent decision to deny our appeal for the above referenced FRN because of "the funding request is duplicative of a current year's FRN. Program rules prohibit USAC from funding the same products and services, to the same location in the same funding year".

I am the contact person on all of Chapel Hill-Carrboro City District E-Rate applications and I am authorized by Chapel Hill-Carrboro City District to represent them in this matter. We are requesting that this decision be reversed and that the requested funding of \$372,406.92 included in the above referenced 471 application and FRN be awarded to the district in its entirety.

The denial of funding should be reversed for the following reasons:

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List ABCDE

We believe the SLD erred in denying funds because:

- The services supplied from AT&T, FRN # 2623004, is for the telephony circuits only. It includes dial tone and local/long distance service and the AT&T service alone does not allow the system to make calls. The District must use a PBX of some sort whether that is an on-site analog system, a VoIP system or a hosted VoIP system.

As confirmed by an email from AT&T to Chapel Hill-Carrboro City District, AT&T is only providing the below 3 PRIs to Chapel Hill. There are a total of 69 B Channels and 125 DID's with all 3 Channels showing as active. Please also note that per AT&T email, "AT&T hands off the Telephony traffic and unfortunately we do not have any knowledge of what is done with the traffic once it is delivered.":

- The first is circuit 20.IPZX.518226 which is delivered to 750 S Merritt Mill Rd Chapel Hill, NC.
- The second circuit is 20.IPZX.518227 which is delivered to 750 S Merritt Mill Rd Chapel Hill, NC.
- The third is circuit 20.IPZD.511795 which is delivered to 750 S Merritt Mill Rd Chapel Hill, NC.
- The service from NWN, FRN # 2623014, is the call control/call processing and delivery portion of the telephony solution. In this case CHCCS is receiving hosted VoIP services from NWN and local and long distance PRI and Analog services from AT&T. In addition, the NWN service does not include the necessary telephony circuits to complete calls.
- CHCCS must have both pieces of the solution to complete calls. "There is no redundancy in service, and each of these components is E-Rate eligible as shown in the Eligible Services List."

The diagram (Attachment A) below depicts how the system is configured and deploy. We feel that this clearly shows that NWN is not providing duplicate services. Local and long distance calling is provided by AT&T not NWN.

We believe that the denial may have been based on an incorrect statement in the attached letter to me from Ray Reitz the former CTO of Chapel Hill Carrboro City Schools. This letter was submitted during the SLD's Program Integrity Assurance (PIA) review process. In this letter Mr. Reitz states the following:

"This letter is to confirm that we have multiple FRNs for local and long distance services. We use NWN for hosted IP Telephony (IPT, aka VoIP (local, long distance) services and AT&T for local, long distance, DTS and Centrex services. These services are not duplicate and they are both being utilized by all the entities associated with CHCCS."

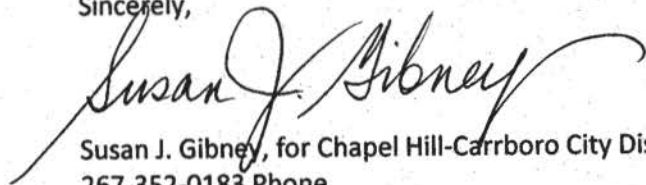
Mr. Reitz misspoke when he stated CHCCS uses NWN for "IPT, aka VoIP (local, long distance) services". NWN only provides the Interconnected VoIP platform which Mr. Reitz refers to as "IPT, aka VoIP". NWN service provides call control/call processing, internal on-net calling and voice mail services. AT&T provides all local and long distance (off-net) services. Therefore NWN is not providing a duplicate service to what AT&T is providing. As stated earlier; NWN service does not include the necessary telephony circuits to complete calls. CHCCS must have both pieces of the solution to complete calls.

Regarding USAC's second concern, Form 472 Item 21 Attachment 1 (document attached) that was submitted for NWN's services also contained an inaccurate statement. It contained "Monthly VoIP district wide - Local/LD, PRI, DSL" in the Product Services Description field. As stated above, NWN is not providing the Local/LD, PRI, DSL services with our offering. AT&T is providing those services for CHCCS therefore our request for NWN's services is not a duplicate request.

We believe that the facts of our case and the specifics of our appeal more than justify our request. I have attached copies of all correspondence regarding this appeal and ultimate denial of funding for this FRN to this letter. We believe this justifies reversal of this decision and granting of funding for FRN # 2623014 on 471 application number 965006 for Chapel Hill-Carrboro City District in the amount of \$372,406.92. It is within the spirit and intent of the E-rate program to fully fund this FRN and we are requesting that the correction be allowed and the funding be approved for this FRN.

Thank you for your consideration.

Sincerely,



Susan J. Gibney, for Chapel Hill-Carrboro City District

267-352-0183 Phone

215-504-5047 Fax

sgibney@eratespecialist.org

CERTIFIED MAIL #

Return Receipt Requested

Enclosed:

Letter from Ray Reitz

FCDL dated 10/1/2014 denying funding

Item 21 for NWN and ATT

Appeal denial letter

Attachment A, NWN-ATT services description chart



May 13, 2014

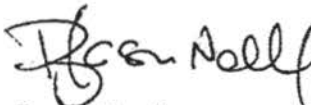
Susan J. Gibney
Education Consortium
sgibney@e-rate-ects.org

Dear Susan,

This letter is to confirm that we have multiple FRNs for local and long distance services. We use NWN for hosted IP Telephony (IPT, aka VoIP (local, long distance) services and AT&T for local, long distance, DTS, and Centrex services. These services are not duplicated and they are both being utilized by all the entities associated with CHCCS.

Sincerely,


Ray Reitz
CTO, CHCCS


Doug Noell
Director of IT Operations, CHCCS



Universal Service Administrative Company

Schools and Libraries Division

FUNDING COMMITMENT DECISION LETTER
(Funding Year 2014: 07/01/2014 - 06/30/2015)

October 1, 2014

SUSAN GIBNEY
CHAPEL HILL-CARRBORO CITY DIST
790 NEWTOWN-YARDLEY ROAD
SUITE 410
NEWTOWN, PA 18940

Re: FCC Form 471 Application Number: 965006
Billed Entity Number (BEN): 126853
Billed Entity FCC Registration Number (FCC RN): 0011951324
Applicant's Form Identifier: 17CHAPELHILLCARRBOROCITYDISTSG

Thank you for your Funding Year 2014 application for Universal Service Support and for any assistance you provided throughout our review. The current status of the funding request(s) in the FCC Form 471 application cited above and featured in the Funding Commitment Report(s) (Report) at the end of this letter is as follows.

- The amount, \$217,020.74 is "Approved."
- The amount, \$186,203.46 is "Denied."

Please refer to the Report following this letter for specific funding request decisions and explanations. The Universal Service Administrative Company (USAC) is also sending this information to your service provider(s) so preparations can begin for implementing your approved discount(s) after you file FCC Form 486, Receipt of Service Confirmation Form. A guide that provides a definition for each line of the Report is available in the Guide to USAC Letter Reports in the Reference Area of our website.

NEXT STEPS

- Work with your service provider to determine if you will receive discounted bills or if you will request reimbursement from USAC after paying your bills in full.
- Review technology planning approval requirements.
- Review Children's Internet Protection Act (CIPA) requirements.
- File FCC Form 486.
- Invoice USAC using the FCC Form 474, Service Provider Invoice (SPI) Form, or FCC Form 472, Billed Entity Applicant Reimbursement (BEAR) Form, - as products and services are being delivered and billed.

TO APPEAL THIS DECISION:

If you wish to appeal a decision in this letter to USAC, your appeal must be received by USAC or postmarked within 60 days of the date of this letter. Failure to meet this requirement will result in automatic dismissal of your appeal. In your letter of appeal:

1. Include the name, address, telephone number, fax number, and email address for the person who can most readily discuss this appeal with us.

Schools and Libraries Division - Correspondence Unit
30 Lanidex Plaza West, PO Box 685, Parsippany, NJ 07054-0685
Visit us online at: www.usac.org/sl

2. State outright that your letter is an appeal. Include the following to identify the USAC decision letter (e.g., FCDL) and the decision you are appealing:
 - Appellant name,
 - Applicant name and service provider name, if different from appellant,
 - Applicant BEN and Service Provider Identification Number (SPIN),
 - FCC Form 471 Application Number 965006 and the Funding Request Number (FRN) or Numbers as assigned by USAC,
 - "Funding Commitment Decision Letter for Funding Year 2014," AND
 - The exact text or the decision that you are appealing.
3. Please keep your letter to the point, and provide documentation to support your appeal. Be sure to keep a copy of your entire appeal, including any correspondence and documentation.
4. If you are the applicant, please provide a copy of your appeal to the service provider(s) affected by USAC's decision. If you are the service provider, please provide a copy of your appeal to the applicant(s) affected by USAC's decision.
5. Provide an authorized signature on your letter of appeal.

We strongly recommend that you use one of the electronic filing options. To submit your appeal to USAC by email, email your appeal to appeals@sl.universalservice.org or submit your appeal electronically by using the "Submit a Question" feature on the USAC website. USAC will automatically reply to incoming emails to confirm receipt.

To submit your appeal to USAC by fax, fax your appeal to (973) 599-6542.

To submit your appeal to USAC on paper, send your appeal to:

Letter of Appeal
 Schools and Libraries Division - Correspondence Unit
 30 Lanidex Plaza West
 PO Box 685
 Parsippany, NJ 07054-0685

For more information on submitting an appeal to USAC, please see "Appeals" in the Schools and Libraries section of the USAC website.

OBLIGATION TO PAY NON-DISCOUNT PORTION

Applicants are required to pay the non-discount portion of the cost of the products and/or services to their service provider(s). Service providers are required to bill applicants for the non-discount portion. The FCC stated that requiring applicants to pay their share ensures efficiency and accountability in the program. If USAC is being billed via the FCC Form 474, the service provider must bill the applicant at the same time it bills USAC. If USAC is being billed via the FCC Form 472, the applicant pays the service provider in full (the non-discount plus discount portion) and then seeks reimbursement from USAC. If you are using a trade-in as part of your non-discount portion, please refer to Disposal or Trade-in of Equipment posted in the Reference Area of our website for more information.

NOTICE ON RULES AND FUNDS AVAILABILITY

Applicants' receipt of funding commitments is contingent on their compliance with all statutory, regulatory, and procedural requirements of the Schools and Libraries Program. Applicants who have received funding commitments continue to be subject to audits and other reviews that USAC and/or the FCC may undertake periodically to assure that funds that have been committed are being used in accordance with all such requirements. USAC may be required to reduce or cancel funding commitments that were not issued in accordance with such requirements, whether due to action or inaction, including but not limited to that by USAC, the applicant, or the service provider. USAC, and other appropriate authorities (including but not limited to the FCC), may pursue enforcement actions and other means of recourse to collect improperly disbursed funds. The timing of payment of invoices may also be affected by the availability of funds based on the amount of funds collected from contributing telecommunications companies.

Schools and Libraries Division
Universal Service Administrative Company



FUNDING COMMITMENT REPORT
Billed Entity Name: CHAPEL HILL-CARRBORO CITY DIST
BEN: 126853
Funding Year: 2014

Comment on RAL corrections: FRN(s) modified in accordance with a RAL request.

FCC Form 471 Application Number: 965006
Funding Request Number: 2622994
Funding Status: Funded
Category of Service: Internet Access
FCC Form 470 Application Number: 339340001011270
SPIN: 143020189
Service Provider Name: eChalk Inc.
Contract Number: C
Billing Account Number: 07-10304-43299
Multiple Billing Account Numbers: N
Service Start Date: 07/01/2014
Service End Date: N/A
Contract Award Date: 03/01/2012
Contract Expiration Date: 06/30/2015
Shared Worksheet Number: 1666856
Number of Months Recurring Service Provided in Funding Year: 12
Annual Pre-discount Amount for Eligible Recurring Charges: \$.00
Annual Pre-discount Amount for Eligible Non-recurring Charges: \$193,321.96
Pre-discount Amount: \$193,321.96
Discount Percentage Approved by the USAC: 50%
Funding Commitment Decision: \$96,660.98 - FRN approved; modified by SLD
Funding Commitment Decision Explanation: The FRN was modified from \$66,002.62 to \$193,321.96 to agree with the applicant documentation.

FCDL Date: 10/01/2014
Wave Number: 021
Last Allowable Date for Delivery and Installation for Non-Recurring Services: 09/30/2015
Consultant Name: Susan Gibney
Consultant Registration Number (CRN): 16024807
Consultant Employer: Educational Consortium for Telecom Savings

FUNDING COMMITMENT REPORT
Billed Entity Name: CHAPEL HILL-CARRBORO CITY DIST
BEN: 126853
Funding Year: 2014

Comment on RAL corrections: FRN(s) modified in accordance with a RAL request.

FCC Form 471 Application Number: 965006
Funding Request Number: 2623000
Funding Status: Funded
Category of Service: Telecommunications Service
FCC Form 470 Application Number: 609210001162348
SPIN: 143004824
Service Provider Name: BellSouth Telecommunications, LLC
Contract Number: MTM
Billing Account Number: 919 M-25-3727727
Multiple Billing Account Numbers: N
Service Start Date: 07/01/2014
Service End Date: 06/30/2015
Contract Award Date: N/A
Contract Expiration Date: N/A
Shared Worksheet Number: 1666856
Number of Months Recurring Service Provided in Funding Year: 12
Annual Pre-discount Amount for Eligible Recurring Charges: \$99,600.00
Annual Pre-discount Amount for Eligible Non-recurring Charges: \$.00
Pre-discount Amount: \$99,600.00
Discount Percentage Approved by the USAC: 50%
Funding Commitment Decision: \$49,800.00 - FRN approved as submitted

FCDL Date: 10/01/2014
Wave Number: 021
Last Allowable Date for Delivery and Installation for Non-Recurring Services: 09/30/2015
Consultant Name: Susan Gibney
Consultant Registration Number (CRN): 16024807
Consultant Employer: Educational Consortium for Telecom Savings

FUNDING COMMITMENT REPORT
Billed Entity Name: CHAPEL HILL-CARRBORO CITY DIST
BEN: 126853
Funding Year: 2014

Comment on RAL corrections: FRN(s) modified in accordance with a RAL request.

FCC Form 471 Application Number: 965006
Funding Request Number: 2623004
Funding Status: Funded
Category of Service: Telecommunications Service
FCC Form 470 Application Number: 609210001162348
SPIN: 143004824
Service Provider Name: BellSouth Telecommunications, LLC
Contract Number: MTM
Billing Account Number: 910 M12-4541 856
Multiple Billing Account Numbers: Y
Service Start Date: 07/01/2014
Service End Date: 06/30/2015
Contract Award Date: N/A
Contract Expiration Date: N/A
Shared Worksheet Number: 1666856
Number of Months Recurring Service Provided in Funding Year: 12
Annual Pre-discount Amount for Eligible Recurring Charges: \$132,000.00
Annual Pre-discount Amount for Eligible Non-recurring Charges: \$.00
Pre-discount Amount: \$132,000.00
Discount Percentage Approved by the USAC: 50%
Funding Commitment Decision: \$66,000.00 - FRN approved as submitted

FCDL Date: 10/01/2014
Wave Number: 021
Last Allowable Date for Delivery and Installation for Non-Recurring Services: 09/30/2015
Consultant Name: Susan Gibney
Consultant Registration Number (CRN): 16024807
Consultant Employer: Educational Consortium for Telecom Savings

FUNDING COMMITMENT REPORT
Billed Entity Name: CHAPEL HILL-CARRBORO CITY DIST
BEN: 126853
Funding Year: 2014

Comment on RAL corrections: FRN(s) modified in accordance with a RAL request.

FCC Form 471 Application Number: 965006
Funding Request Number: 2623014
Funding Status: Not Funded
Category of Service: Internet Access
FCC Form 470 Application Number: 414430001067125
SPIN: 143017706
Service Provider Name: NWN Corporation-Raleigh
Contract Number: C
Billing Account Number: N/A
Multiple Billing Account Numbers: N
Service Start Date: 07/01/2014
Service End Date: N/A
Contract Award Date: 03/14/2013
Contract Expiration Date: 06/30/2018
Shared Worksheet Number: 1666856
Number of Months Recurring Service Provided in Funding Year: 12
Annual Pre-discount Amount for Eligible Recurring Charges: \$372,406.92
Annual Pre-discount Amount for Eligible Non-recurring Charges: \$.00
Pre-discount Amount: \$372,406.92
Discount Percentage Approved by the USAC: 50%
Funding Commitment Decision: \$0.00 - Duplicate FRN
Funding Commitment Decision Explanation: This FRN is denied because the funding request is duplicative of a current year's FRN. Program rules prohibit USAC from funding the same products and services, to the same location in the same funding year.

FCDL Date: 10/01/2014
Wave Number: 021
Last Allowable Date for Delivery and Installation for Non-Recurring Services: 09/30/2015
Consultant Name: Susan Gibney
Consultant Registration Number (CRN): 16024807
Consultant Employer: Educational Consortium for Telecom Savings

FUNDING COMMITMENT REPORT

Billed Entity Name: CHAPEL HILL-CARRBORO CITY-DIST

BEN: 126853

Funding Year: 2014

Comment on RAL corrections: FRN(s) modified in accordance with a RAL request.

FCC Form 471 Application Number: 965006

Funding Request Number: 2623029

Funding Status: Funded

Category of Service: Telecommunications Service

FCC Form 470 Application Number: 609210001162348

SPIN: 143000677

Service Provider Name: Verizon Wireless (Cellco Partnership)

Contract Number: MTM

Billing Account Number: 723084662-00001

Multiple Billing Account Numbers: N

Service Start Date: 07/01/2014

Service End Date: 06/30/2015

Contract Award Date: N/A

Contract Expiration Date: N/A

Shared Worksheet Number: 1666856

Number of Months Recurring Service Provided in Funding Year: 12

Annual Pre-discount Amount for Eligible Recurring Charges: \$7,200.00

Annual Pre-discount Amount for Eligible Non-recurring Charges: \$.00

Pre-discount Amount: \$7,200.00

Discount Percentage Approved by the USAC: 50%

Funding Commitment Decision: \$3,600.00 - FRN approved as submitted

FCDL Date: 10/01/2014

Wave Number: 021

Last Allowable Date for Delivery and Installation for Non-Recurring Services: 09/30/2015

Consultant Name: Susan Gibney

Consultant Registration Number (CRN): 16024807

Consultant Employer: Educational Consortium for Telecom Savings

FUNDING COMMITMENT REPORT

Billed Entity Name: CHAPEL HILL-CARRBORO CITY-DIST

BEN: 126853

Funding Year: 2014

Comment on RAL corrections: FRN(s) modified in accordance with a RAL request.

FCC Form 471 Application Number: 965006

Funding Request Number: 2714545

Funding Status: Funded

Category of Service: Telecommunications Service

FCC Form 470 Application Number: 609210001162348

SPIN: 143025240

Service Provider Name: AT&T Mobility

Contract Number: MTM

Billing Account Number: 287252249094

Multiple Billing Account Numbers: N

Service Start Date: 07/01/2014

Service End Date: 06/30/2015

Contract Award Date: N/A

Contract Expiration Date: N/A

Shared Worksheet Number: 1666856

Number of Months Recurring Service Provided in Funding Year: 12

Annual Pre-discount Amount for Eligible Recurring Charges: \$1,919.52

Annual Pre-discount Amount for Eligible Non-recurring Charges: \$.00

Pre-discount Amount: \$1,919.52

Discount Percentage Approved by the USAC: 50%

Funding Commitment Decision: \$959.76 - Modified by SLD

Funding Commitment Decision Explanation: MR1: FRN modified in accordance with a RAL request. <><><><><> MR2: FRN 2714545 in the total annual amount of \$1919.52 with the service provider AT&T Mobility 143025240 has been added to the FCC Form 471

Application in consultation with the applicant.

FCDL Date: 10/01/2014

Wave Number: 021

Last Allowable Date for Delivery and Installation for Non-Recurring Services: 09/30/2015

Consultant Name: Susan Gibney

Consultant Registration Number (CRN): 16024807

Consultant Employer: Educational Consortium for Telecom Savings



Educational Consortium for
Telecommunications Savings

790 Newtown-Yardley Rd. Suite 410
Newtown, PA 18940
267-352-0183 (phone)
215-504-5047 (fax)

School District: Chapel Hill-Carrboro City

Form 471 Item 21: Attachment 1

471 #: 965006

Entity #: 126853

FRN #: 2623014

Service Provider: NWN

Account Number: N/A

Narrative Description: Internet Service

Quantity	Product Service Description	Unit Cost	Extended Pre-Discount Cost	
			Recurring	Non-Recurring
12	Monthly VoIP district wide (local/LD)	\$31,033.91	\$372,406.92	
	Total cost \$31,033.91, ineligible has been removed, in the amount of \$619.38.			
	Totals		\$372,406.92	

All ineligible items have been removed from this funding request, including Yellow Pages advertizing, Additional directory listings, Unlisted number charges, pay phones, one time charges, equipment charges & inside wire maintenance

Additional Account Number: contract 2018



Educational Consortium for
Telecommunications Savings

790 Newtown-Yardley Rd. Suite 410
Newtown, PA 18940
267-352-0183 (phone)
215-504-5047 (fax)

School District: Chapel Hill-Carrboro City

Form 471 Item 21: Attachment 1

471 #: 965006

Entity #: 126853

FRN #: 2623004

Service Provider: ATT

Account Number: 9199678211

Narrative Description: Local and Long Distance Service
Centrex, PRI, ISP, DTS

Quantity	Product Service Description	Unit Cost	Extended Pre-Discount Cost	
			Recurring	Non-Recurring
12	Monthly local and long distance service, Centrex, PRI, ISP and DTS \$488x5 telephone service 100 lines	11,000	\$132,000.00	
		Totals	\$132,000.00	

All ineligible items have been removed from this funding request, including Yellow Pages advertizing, Additional directory listings, Unlisted number charges, pay phones, one time charges, equipment charges & inside wire maintenance

Additional Account Number: 9199675299, 9199675602, 1717930828930, 910M124541



Universal Service Administrative Company
Schools & Libraries Division

Administrator's Decision on Appeal – Funding Year 2014-2015

December 23, 2014

Susan Gibney
Chapel Hill-Carrboro City Dist
790 Newtown-yardley Road
Suite 410
Newtown, PA 18940


Re: Applicant Name: CHAPEL HILL-CARRBORO CITY DIST
Billed Entity Number: 126853
Form 471 Application Number: 965006
Funding Request Number(s): 2623014
Your Correspondence Dated: November 07, 2014

After thorough review and investigation of all relevant facts, the Schools and Libraries Division (SLD) of the Universal Service Administrative Company (USAC) has made its decision in regard to your appeal of USAC's Funding Year 2014 Funding Commitment Decision Letter for the Application Number indicated above. This letter explains the basis of USAC's decision. The date of this letter begins the 60 day time period for appealing this decision. If your Letter of Appeal included more than one Application Number, please note that you will receive a separate letter for each application.

Funding Request Number(s): 2623014
Decision on Appeal: **Denied**
Explanation:

- Your FCC Form 471 application included costs for duplicate services. USAC has given you an opportunity to provide the appropriate additional documentation demonstrating the eligibility of the products and/or services requested and you failed to do so. In your appeal, you did not show that USAC's determination was incorrect. Consequently, your appeal is denied.
- FCC rules provide that funding may be approved only for eligible products and services. See 47 C.F.R. secs. 54.502. The USAC website contains a list of eligible products and services. See Eligible Services List posted in the Reference Area of the SLD section of the USAC website. FCC rules further require that if 30% or more of the applicant's funding request includes ineligible products and/or services, then the funding request must be denied, otherwise the funding

request will be reduced accordingly. *See* 47 C.F.R. sec. 54.504(b). The FCC's Aiken County Public Schools Order directed USAC to permit the applicant 15 calendar days from the date of receipt of notice in writing by USAC to revise its funding request to remove the ineligible services or allow the applicant to provide additional documentation to show why the services are eligible. *See* Requests for Review of the Decisions of the Universal Service Administrator by Aiken County Public Schools, Aiken, South Carolina, et al., Schools and Libraries Universal Service Support Mechanism, File Nos. SLD-397612, et al., CC Docket No. 02-6, Order, 22 FCC Rcd 8735, FCC 07-61 para. 11 (May 8, 2007).



Since your appeal was denied in full, dismissed or cancelled, you may file an appeal with the FCC. Your appeal must be postmarked within 60 days of the date on this letter. Failure to meet this requirement will result in automatic dismissal of your appeal. You should refer to CC Docket No. 02-6 on the first page of your appeal to the FCC. If you are submitting your appeal via United States Postal Service, send to: FCC, Office of the Secretary, 445 12th Street SW, Washington, DC 20554. Further information and options for filing an appeal directly with the FCC can be found under the Reference Area/"Appeals" of the SLD section of the USAC website or by contacting the Client Service Bureau. We strongly recommend that you use the electronic filing options.

We thank you for your continued support, patience and cooperation during the appeal process.

Schools and Libraries Division
Universal Service Administrative Company

Attachment A

The area shaded in blue depicts the Interconnected VoIP services that NWN provides under FRN 2623014.

The area shaded in green depicts the local and long distance PSTN services that AT&T provides under the FRN 2623004.

